CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

76-117

Generic Name:

Ibuprofen Tablets USP, 200 mg

Sponsor:

Reddy-Cheminor, Inc.

Approval Date:

November 20, 2001

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

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Pharmacology Review(s)		
Statistical Review(s)		
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Clinical Pharmacology & Biopharmaceutics Reviews		
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Administrative Document(s)	X	
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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

APPROVAL LETTER

Reddy-Cheminor, Inc. Attention: Paul V. Campanelli U.S. Agent for: Dr. Reddy's Laboratories Limited One Park Way Upper Saddle River, NJ 07458

Dear Sir:

This is in reference to your abbreviated new drug application dated February 14, 2001, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Ibuprofen Tablets USP, 200 mg (OTC).

Reference is also made to your amendments dated May 11, August 16, and October 1, 2001.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for over-the-counter (OTC) use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Ibuprofen Tablets USP, 200 mg to be bioequivalent to the listed drug (Nuprin® Tablets, 200 mg, of McNeil Consumer Products Company, Division of McNeilab Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

Under Section 506A of the Act, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

Sincerely yours,

Gary Buehler

11/20/01

Director

Office of Generic Drugs

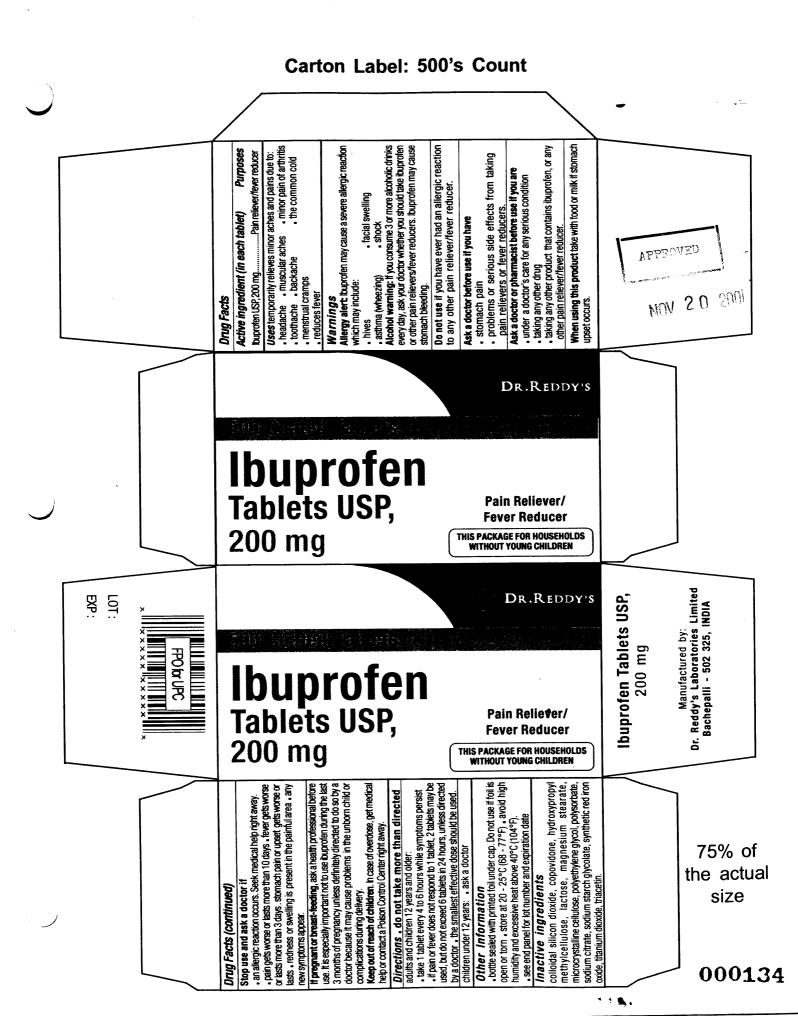
Center for Drug Evaluation and Research

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

Final Printed Labeling

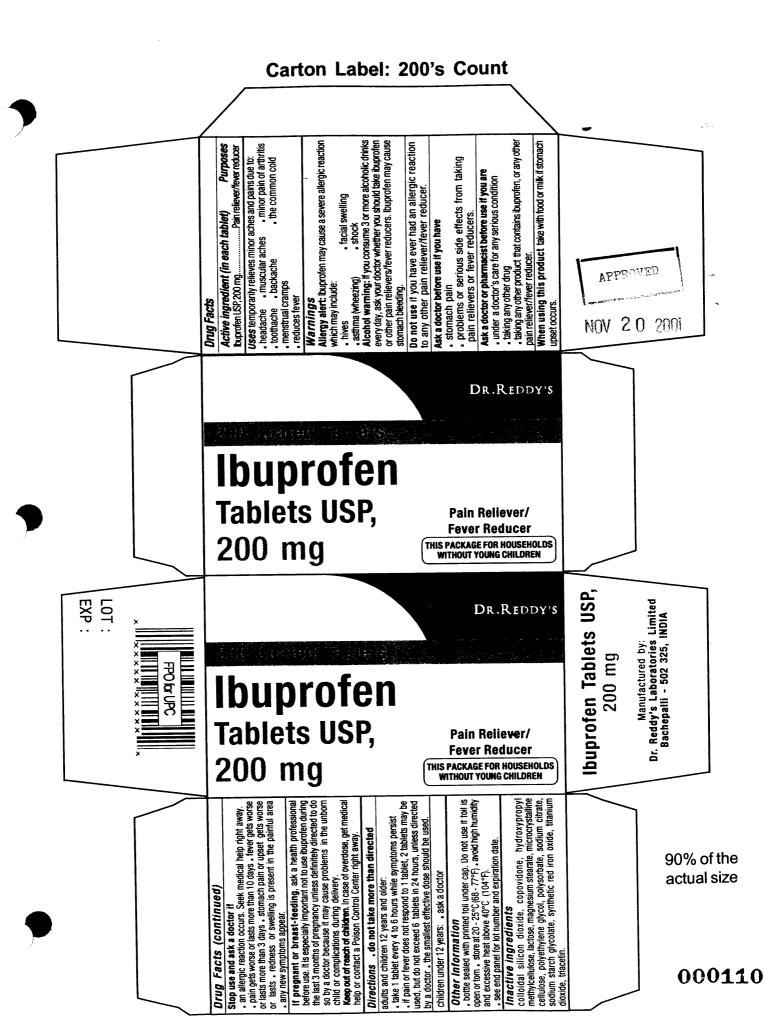


Carton Label: 250's Count Alcohol warning: If you consume 3 or more alcoholic drinks every day, ask your doctor whether you should take buprofen or other pain relievers/fever reducers. Ibuprofen may cause stomach bleeding. taking any other product that contains ibuprofen, or any other Allergy alert: Ibuprofen may cause a severe allergic reaction which may include: When using this product take with food or milk if stomach Uses temporarily relieves minor aches and pains due to:
• headache • muscular aches • minor pain of arthritis **Do not use** it you have ever had an allergic reaction to any other pain reliever/fever reducer. ...Pain reliever/fever reducer problems or serious side effects from taking Ask a doctor or pharmacist before use if you are under a doctor's care for any serious condition facial swelling pain relievers or fever reducers Ask a doctor before use if you have . headache . muscular aches . toothache . backache . menstrual cramps APPROVED pain reliever/fever reduce asthma (wheezing) stomach pain reduces fever MOV 20 2001 DR. REDDY'S **Ibuprofen** Tablets USP, Pain Reliever/ **Fever Reducer** 200 mg THIS PACKAGE FOR HOUSEHOLDS WITHOUT YOUNG CHILDREN Ibuprofen Tablets USP, Manufactured by: Reddy's Laboratories Limited Bachepalli - 502 325, INDIA DR.REDDY'S FPO for UPC **Ibuprofen** Tablets USP, Pain Reliever/ **Fever Reducer** 200 mg THIS PACKAGE FOR HOUSEHOLDS WITHOUT YOUNG CHILDREN If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use ibuprofen during the last 3 months of pregnancy unless definitely directed to 00 so by a doctor because it may cause problems in the unborn child or complications during delivery.

Keep out of reach of children, in case of overdose, get medical help or contact a Poison Control Center right away. an allergic reaction occurs. Seek medical help right away.
 pain gets worse or lasts more than 10 days. fever gets worse or lasts more than 3 days. stomach pain or upset gets worse or lasts. redness or swelling is present in the painful area any new symptoms appear. colloidal silicon dioxide, copovidone, hydroxypropyl methylcellulose, lactose, magnesium stearate, microcrystalline cellulose, polyethylene glycol, polysorbate, sodium citrate, sodium starch glycolate, synthetic red iron oxide, titanium dioxide, triacetin. aduits and children 12 years and older:

take 1 tablet every 4 to 6 hours while symptoms persist

if pain or fever does not respond to 1 tablet, 2 tablets may be
used, but do not exceed 6 tablets in 24 hours, unless directed **Other Information**• bottle sealed with printed toil under cap. Do not use if toil is open or form • store at 20 - 25°C (68 - 77°F) • avoid high humidity and excessive heat above 40° C (104° F). by a doctor. the smallest effective dose should be used . do not take more than directed 90% of the children under 12 years: ask a doctor actual size 000122



Carton Label: 150's Count

Pain reliever/fever reducer

the common cold

Alcohol warning: if you consume 3 or more alcoholic drinks every day, ask your doctor whether you should take founcien or other pain relievers/fever reducers. Ibuprofen may cause Uses temporarily relieves minor aches and pains due to:
headache muscular aches minor pain of arthritis Warnings Allergy alert: Duprofen may cause a severe allergic reaction taking any other drug
 taking any other product that contains ibuprofen, or any other **Do not use** it you have ever had an allergic reaction to any other pain reliever/fever reducer. When using this product take with food or milk if stomach problems or serious side effects from taking pain relievers or fever reducers. Ask a doctor or pharmacist before use if you are under a doctor's care for any serious condition Active ingredient (in each tablet)
tuprofen USP, 200 mg Ask a doctor before use if you have oain reliever/fever reducer , menstrual cramps which may include stomach bleeding. reduces fever NOV 20 DR. REDDY'S Ibuprofen Tablets USP, Pain Reliever/ **Fever Reducer** 200 mg THIS PACKAGE FOR HOUSEHOLDS WITHOUT YOUNG CHILDREN buprofen Tablets USP, EXP DR.REDDY'S 200 mg FPO for UPC **Ibuprofen** Tablets USP, Pain Reliever# **Fever Reducer** 200 mg THIS PACKAGE FOR HOUSEHOLDS WITHOUT YOUNG CHILDREN If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use ibuprofen during the last 3 months of pregnancy unless definitely directed to do so by a doctor because if may cause problems in the unborn child or complications during delivery.

Keep out of reach of children. In case of overdose, get medical help or contact a Polson Control Center right away. , pain gets worse or lasts more than 10 days . fever gets worse or lasts more than 3 days . stomach pain or upset gets worse or lasts . redness or swelling is present in the painful area if pain or fever does not respond to 1 tablet, 2 tablets may be used, but do not exceed 6 tablets in 24 hours, unless directed colloidal silicon dioxide, copovidone, hydroxypropyl methylcellulose, lactose, magnesium stearate, microcrystalline cellulose, polyethylene glycol, polysorbate, sodium citrate, sodium starch glycolate, synthetic red iron oxide, titanium bottle sealed with printed toil under cap. Do not use it toil is open or tom.
 store at 20 - 25°C (68 - 77°F)
 avoid high humidity and excessive heat above 40°C (104°F) take 1 tablet every 4 to 6 hours while symptoms persist by a doctor , the smallest effective dose should be used Directions . do not take more than directed children under 12 years: • ask a doctor adults and children 12 years and older Inactive ingredients Other Information

90% of the actual size

APPROVED

2001

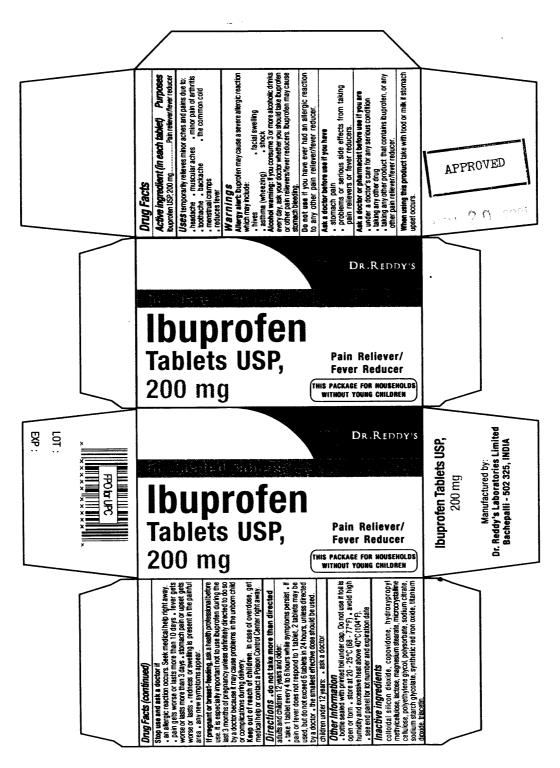
Manufactured by: Reddy's Laboratories Limited Bachepalli - 502 325, INDIA

000099

Carton Label: 100's Count

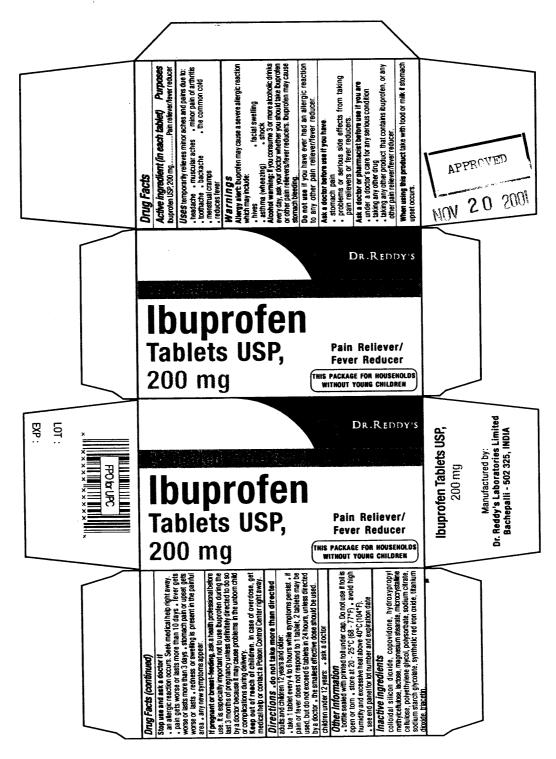


Carton Label: 50's Count



100% of the actual size

Carton Label: 24's Count



100% of the actual size

Container Label: 500's Count

Bottle sealed with printed foil under cap. Do not use if foil is ope or tom.

Drug Facts

Active ingredient (in each table) PROVED Purpos lbuprofen USP, 200 mg......

.....Pain reliever / fever reduce Uses temporarily relieves mire achee and pains due to:

- headache muscular aches minor pain of arthritis toothache = backache = the common cold = menstrual cramps
- · reduces fever

Allergy alert: Ibuprofen may cause a severe allergic reaction which may include:

 hives a facial swelling a asthma (wheezing) a shock Alcohol warning: If you consume 3 or more alcoholic drinks pain reliever/fever reducer. When using this symptoms persist a if pain or fever does not every day, ask your doctor whether you should take ibuprofen or product take with food or milk if stomach respond to 1 tablet, 2 tablets may be used, other pain relievers/fever reducers. Ibuprofen may cause stomach upset occurs. Stop use and ask a doctor if but do not exceed 6 tablets in 24 hours, unless bleeding. Do not use if you have ever had an allergic reaction to an allergic reaction occurs. Seek medical directed by a doctor at the smallest effective any other pain reliever/fever reducer. Ask a doctor before use if help right away a pain gets worse or lasts dose should be used. Children under 12 years: you have . stomach pain . problems or serious side effects from more than 10 days . fever gets worse or ask a doctor taking pain relievers or fever reducers. Ask a doctor or pharmacist lasts more than 3 days a stomach pain or a store at 20 - 25°C (68 - 77°F)

before use if you are a under a doctor's care for any serious upset gets worse or lasts a redness or a world high humidity and excessive heat condition a taking any other drug a taking any other

| Swelling is present in the painful area | above 40°C (104°F).

DR.REDDY'S

Ibuprofen Tablets USP, 200 mg

Drug Facts (continued)

Drug Facts (continued)

any new symptoms appear. If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use ibuprofen during the last 3 months of pregnancy unless definitely directed to do so by a doctor because it may cause problems in the unborn child or complications during delivery. Keep out of reach of children. In case of overdose, get medical help or contact Pain Reliever/Fever Reducer a Poison Control Center right away.

Directions - do not take more than directed Adults and children 12 years and older: product that contains ibuprofen, or any other • take 1 tablet every 4 to 6 hours while

ă E

Bottle sealed with printed foil undiffrees. Do not use if foil is open or torn APPROVED

Drug Facts

Active ingredient (in each tablet) lbuprofen USP, 200 mg....

Purpos ...Pain reliever / fever reduc Uses temporarily relieves minor aches and pains due to

 headache • muscular aches • minor pain of arthritis a toothache a backache a the common cold a menstrual cramps

Warnings

Allergy alert: Ibuprofen may cause a severe allergic reaction which may include:

. hives . facial swelling . asthma (wheezing) . shock Alcohol warning: If you consume 3 or more alcoholic drinks pain reliever/fever reducer. When using this symptoms persist a if pain or fever does not every day, ask your doctor whether you should take ibuprofen or product take with food or milk if stomach other pain relievers/fever reducers. Ibuprofen may cause stomach upset occurs. Stop use and ask a doctor if but do not exceed 6 tablets in 24 hours, unless bleeding. Do not use if you have ever had an allergic reaction to an allergic reaction occurs. Seek medical directed by a doctor at the smallest effective any other pain reliever/fever reducer. Ask a doctor before use if help right away a pain gets worse or lasts dose should be used. Children under 12 years: vou have a stomach pain a problems or serious side effects from more than 10 days a fever gets worse or lasts over should be used. Children under 12 years: you have a stomach pain a problems or serious side effects from more than 10 days a fever gets worse or ask a doctor taking pain relievers or fever reducers. Ask a doctor or pharmacist lasts more than 3 days a stomach pain or a store at 20 - 25°C (68 - 77°F)

before use if you are a under a doctor's care for any serious upset gets worse or lasts a redness or a avoid high humidity and excessive heat condition a taking any other drug a taking any other

| Swelling is present in the painful area | Shove 40°C (104°F).

DR.REDDY'S

Ibuprofen Tablets USP, 200 mg

Pain Reliever/Fever Reducer a Poison Control Center right away.

Drug Facts (continued)

Drug Facts (continued)

 any new symptoms appear. If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use ibuprofen during the last 3 months of pregnancy unless definitely directed to do so by a doctor because it may cause problems in the unborn child or complications during delivery. Keep out of reach of children. In case of overdose, get medical help or contact

Directions .. do not take more than directed Adults and children 12 years and older: product that contains ibuprofen, or any other • take 1 tablet every 4 to 6 hours while respond to 1 tablet 2 tablets may be used.

r. Dr. Reddys L. Bachepalli -Š

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s Limited INDIA

y. Dr. Reddy's Laboratories Li Bachepalli - 502 325, IN NOV 2 0

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Bottle sealed with printed foil under cap. Do por use if foil is open or torn. **Drug Facts**

* Tablets USP, 200 mg

backache a the common cold a menstrual cramas a redbods fever

Warnings

Altergy alert: Duprofen may cause a severe allergic eaction watch

a hives a facial swelling a asthma (wheezing) = shock

Abothol warnings**

Albothol warnings**

Bottle sealed with printed foil under cap. Do not use if foil is open or torn.

DR.REDDY'S

Ibuprofen

Drug Facts (continued)

is present in the painful area a any new symptoms appear. If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use buprofer during the last 3 monits of pregnancy unless definitely directed to do so by a doctor because it may cause problems in the unborn child or complications during delivery. Keep out of reach of children. In case of overdose, get medical help or contact a Poison Control Center right away. Directions - do not take more than directed Adults and children 12 years and older: a late 1 tablet every 4 to 6 hours while symptoms persist a if pain or lever does not respond to 1 tablet, 2 tablets may be used, but do not exceed 6 tablets in 24 hours, unless directed by a doctor a the smallest effective dose should be used. Children under 12 years: ask a doctor is present in the painful area a any new symptoms appear. If pregnant or breast-feeding, ask a health

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Drug Facts (continued)

s Limited INDIA oy: Dr. Rechey's Laboratories Li Bechepalli - 502 325, IN IVOV 2 0 7 1111 څ

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Bottle sealed with printed foil under cap. Do not use if foil is open or torn.

Drug Facts

Active ingredient (in each tablet)

Duprofen USP, 200 mg.

Pain relies of tevelreducer

Jess temporarly relieves minor actes and pains due to:

Jess temporarly relieves minor and the pains due to:

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Jess temporarly relieves relieve relieves a minor and the pains due to:

Jess temporarly relieves relieve reducers. Buprofen may cause stomach bleeding. De not use if you have ever had an allergic reaction to:

Jess temporarly relieves relieve reducers. Busp of may cause stomach bleeding. De not use if you have ever had an allergic reaction to:

Jess temporarly relieves relieve reducers. Busp de doctor before use if if you are a under a doctor's care for any serious side effects from medical help right away a pain gets worse or lasts more than 10 days a tever gets before use if you are a under a doctor's care for any serious worse or lasts more than 10 days a tever gets before use if you are a under doctor's care for any serious worse or lasts more than 10 days a tever gets before use if you are a under doctor's care for any serious worse or lasts more than 10 days a tever gets before use if you are a under doctor's care for any serious worse or lasts more than 10 days a tever gets before use if you are a under doctor's care for any serious worse or lasts more than 10 days a tever gets before use if you are a under doctor's care for any serious worse or lasts more than 10 days a tever gets before use if you are a under a doctor's care for any serious shows the pain or upset gets worse or lasts more than 10 days a tever gets before use if you are a under a doctor's care for any serious shows or lasts more than 10 days a tever gets before use if you are a under a doctor's care for any s

Drug Facts (continued)

Tablets USP, 200 mg
Pain Reliever/Fever Reducer

Drug Facts (continued)

that contains buprofen, or any other pain elever/Fever reducer. When using this product take with food or milk it stomach upset occurs. She use and ask a doctor it as more than 10 days a lover gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts and the last a more than 3 days a stomach pain or upset gets worse or lasts and the last and the present in the painting area a any new spenal and serve used that specially important not to use buprofen using the special painting of the present in the painting area as a serve steeling, ask a best in present in the painting area as a serve steeling, ask a best in the special profession and get last 3 months of present or last special profession during delivery. Kaep out or last some than 3 days and offer a sake a factor or contact a Poison Control Center of the and children 12 years and older a last and children 12 years and older a sake a doctor and the profession during delivery. Kaep out or last more than 3 days and offer and children 12 years and older and children 12 years and older and children 12 years a

r. Reddy's Laboratories Limited achepalli - 502 325, INDIA INOV 2 0 2001 Dr. Reddy's L Bachepalli

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ibuprofen Tablets USP, 200 mg ain Reliever/Fever Reducer

versurens a de not take more than directed Aduts an children 12 years and older, a bles I lishtid every 40-6 hours white empores it if pan or fewer does not respond to I lisht 2; bibliot may be send, but do not exceed 6 bibliots in 2; bibliots may be send, but do not exceed 6 bibliots in 2; bibliots may be send, but do not exceed 6 bibliots in 2; bibliots may be send, but do not exceed 6 bibliots in 2; bibliots and bibliots of bibliots in color and send of bibliots and children under 12 years: each aductor a store at 20 - 25°C (88 - 77°F) a wood high handling and exceeder beat above 40°C (104°F).

Dr. Reddy's Laboratories Limited Bachepalli - 502 325, INDIA Mfg. by:

CONSUMER LABELING LEAFLET FOR IBUPROFEN TABLETS USP, 200 mg

PLEASE SAVE THIS FOR FUTURE USE.
Only selected information is contained on the both what.
Therefore, you should keep this sheet for future reference.

APPROVED

MOV 20 300

Tablets USP, 200 mg

Pain Reliever / Fever Reducer

Drug Facts Active ingredient (in each stomach bleeding. tablet) ibuprofen USP, 200 mg Purposes Pain reliever / fever reducer Uses temporarily relieves minor aches and pains due to: . headache . muscular aches . minor pain of common cold . menstrual cramps · reduces fever

Warnings Allergy alert: Ibuprofen may cause a

severe allergic reaction which may include: . hives . facial swelling . asthma (wheezing) . shock

Alcohol warning: If you consume 3 or more alcoholic drinks every day, ask your doctor whether you should take ibuprofen or other pain relievers/fever reducers. Ibuprofen may cause

Do not use if you have ever had an allergic reaction to any other pain reliever/ fever reducer.

Ask a doctor before use if you have . stomach pain . problems or arthritis . toothache . backache . the serious side effects from taking pain relievers or fever reducers.

Ask a doctor or pharmacist before use if you are . under a doctor's care (continued) Drūg Facts (continued)
for any serious condition . taking any
other drug . taking any other product
that contains ibuprofen, or any other
pain reliever/fever reducer.

When using this product take with food or milk if stomach upset occurs. Stop use and ask a doctor if an allergic reaction occurs. Seek medical help right away a pain gets worse or lasts more than 10 days a fever gets worse or lasts more than 3 days a stomach pain or upset gets worse or lasts a redness or swelling is present in the painful area any new symptoms appear.

If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use ibuprofen during the last 3 months of pregnancy unless definitely directed to do so by a doctor because it may cause problems in the unborn child or complications during delivery.

Keep out of reach of children. In case of overdose, get medical help or contact a Poison Control Center right away.

Directions . do not take more than directed.

Adults and children 12 years and older: a take 1 tablet every 4 to 6 hours while symptoms persist a if pain or fever does not respond to 1 tablet, 2 tablets may be used, but do not exceed 6 tablets in 24 hours, unless directed by a doctor a the smallest effective dose should be used.

Children under 12 years: ask a doctor. Other Information

 bottle sealed with printed foil under cap. Do not use if foil is open or torn
 store at 20 - 25°C (68 - 77°F)
 avoid high humidity and excessive heat above 40°C (104°F)

Inactive ingredients

colloidal silicon dioxide, copovidone, hydroxypropyl methylcellulose, lactose, magnesium stearate, microcrystalline cellulose, polyethylene glycol, polysorbate, sodium citrate, sodium starch glycolate, synthetic red iron oxide, titanium dioxide, triacetin.

Manufactured by Dr. Reddy's Laboratories Limited Bachepalli - 502 325, INDIA.

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

CHEMISTRY REVIEW(S)

Office of Generic Drugs Center of Drug Evaluation and Research Supplemental Application

Chemistry, Manufacturing and Controls Review

1. CHEMIST'S REVIEW NO.1

2. ANDA **76-117**

NAME AND ADDRESS OF APPLICANT

Dr. Reddy's Laboratories Limited
Contact: Pravir Choubey
Bachepalli
Post Bag No. 15
Kukatpally P.O.
Hyderbad
500 072 INDIA

Phone: 91 40 304 5206 FAX: 91 40 304 5238

U.S. Agent:

Dr. Reddy's Laboratories, Inc., U.S. Agent Attn: C. Jeanne Taborsky Senior Consultant One Park Way
Upper Saddle River, NJ 07458
Phone: 410-309-3145
Fax: 410-309-6145

And

Dr. Reddy's Laboratories, Inc.
Attn: Mr. Paul Campanelli
Vice President Formulations Business
One Park Way
Upper Saddle River, NJ 07458
Phone: 201-760-2880
Fax: 201-760-0401

- 4. LEGAL BASIS FOR ANDA SUBMISSION Prior Approval Supplement
- 5. SUPPLEMENT(s) SCP-001
- 6. ESTABLISHED NAME 7. PROPRIETARY NAME 1buprofen Tablets USP

8. <u>SUPPLEMENT(s)</u> PROVIDE(s) FOR

Technical and stability data on tablets packaged in

9. AMENDMENTS AND OTHER DATES Firm

Orig. Submission

25-JAN-2002

- 10. (PROPOSED) INDICATION(S) FOR USE NSAID
- 11. Rx or OTC OTC
- 12. RELATED IND/NDA/DMF(s)N/A
- 13. DOSAGE FORM Tablets (Oral)
- $\frac{\text{STRENGTH}(S)}{200 \text{ mg}}$
- 15. CHEMICAL NAME AND STRUCTURE

- 16. RECORDS AND REPORTS None
- 17. COMMENTS See bolded items throughout the deficiency

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pages of trade secret and/or

confidential

commercial

information

Office of Generic Drugs Center of Drug Evaluation and Research ABBREVIATED NEW DRUG APPLICACTION

Chemistry, Manufacturing and Controls Review

1. _ CHEMISTOS REVIEW NO.2

2. ANDA **76-117**

3. NAME AND ADDRESS OF APPLICANT

Dr. Reddy's Laboratories Limited

Contact: Pravir Choubey

Bachepalli

Post Bag No. 15

Kukatpally P.O.

Hyderbad

500 072 INDIA

Phone: 91 40 304 5206

FAX: 91 40 304 5238

U.S. Agent:

Dr. Reddy's Laboratories, Inc., U.S. Agent

Attn: C. Jeanne Taborsky

Senior Consultant

One Park Way

___ Upper Saddle River, NJ 07458

Phone: 410-309-3145 Fax: 410-309-6145

ax. 410 505

And

Dr. Reddy's Laboratories, Inc.

Attn: Mr. Paul Campanelli

Vice President Formulations Business

One Park Way

Upper Saddle River, NJ 07458

Phone: 201-760-2880 Fax: 201-760-0401

4. LEGAL BASIS FOR ANDA SUBMISSION

Generic version of McNeil's, MOTRIND. (NDA 17-463). Patent certification and exclusivity statement are provided (page 10).

- 5. SUPPLEMENT(s) N/A
- 6. ESTABLISHED NAME

7. PROPRIETARY NAME

Ibuprofen Tablets

N/A

8. SUPPLEMENT(s) PROVIDE(s) FOR Original ANDA

USP

9. <u>AMENDMENTS AND OTHER DATES</u> Firm

Orig. submission 2/14/01

Response to FAX Deficiency 8/16/01
US Agent Response 10/01/01

FDA

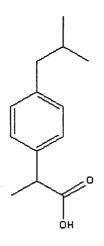
Acknowledgment letter
FAX Deficiency 7/27/01

10. (PROPOSED) INDICATION(S) FOR USE

Anti-inflammatory - Indicated for relief of the signs and symptoms of rheumatoid arthritis and osteoarthritis, for relief of mild to moderate pain and for the treatment of primary dysmenorrhea.

- 11. $\frac{\text{Rx or OTC}}{\text{OTC}}$
- 12. RELATED IND/NDA/DMF(s)
 DMF #
- 13. DOSAGE FORM Tablets (Oral)
- 14. <u>STRENGTH(S)</u> 200 mg

15. CHEMICAL NAME AND STRUCTURE



16. RECORDS AND REPORTS None

17. COMMENTS

- a. Application: Approvable
- b. Labeling: Acceptable 9/4/01
- c. Bio review: Acceptable 8/28/01
- c. Drug Master File Adequate
- d. Methods validation (District): Not required
- d. Establishment evaluation: Acceptable 3/29/01

18. CONCLUSIONS AND RECOMMENDATIONS Not Approvable

19. REVIEWER: RFPowers

DATE COMPLETED:

08/27/01 Revised: 10/23/01

APPEARS THIS WAY ON ORIGINAL

Redacted _____

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confidential

commercial

information

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

BIOEQUIVALENCE REVIEW

OFFICE OF GENERIC DRUGS DIVISION OF BIOEQUIVALENCE

ANDA # : 76-117	SPONSOI	R: Dr. Reddy's Laboratories
DRUG AND DOSAGE FO	ORM: Ibuprofen Tablets	
STRENGTH(S): 200 mg		
TYPES OF STUDIES : Fa	sting and non-fasting	
CLINICAL STUDY SITE	(S):	
ANALYTICAL SITE(S):		
STUDY SUMMARY: Th	e fasting and non-fasting studies are	e acceptable.
DISSOLUTION: The dand the test product meets	issolution testing is acceptable. The USP specifications.	firm has used USP 24 dissolution method
	DSI INSPECTION ST	
Inspection needed: NO	Inspection status:	Inspection results:
First Generic _No	Inspection requested: (date)	
New facility	Inspection completed: (date)	·
For cause		
Other		
PRIMARY REVIEWER	: Kuldeep R. Dhariwal, Ph.D.	BRANCH : II
INITIAL:_\S\	DATE: 8 2	<u>7/01</u>
TEAM LEADER :	S. Nerurkar, Ph. D.	BRANCH : II
INITIAL :	DATE: 872	7/2001
DIRECTOR, DIXISION	OF BIOEQUIVALENCE : DALE	P. CONNER, Pharm. D.

IBUPROFEN TABLETS, USP	Dr. Reddy's Laboratories Limited
200 mg	U.S. Agent: Reddy-Cheminor, Inc.
ANDA 76-117	66 South Maple Avenue, Ridgewood, NJ 07450
Reviewer: Kuldeep R. Dhariwal	Submission Dates: 2/14/01, 5/11/2001
V:\FIRMSAM\CHEMINOR\LTRS&REV\76117SD.201	

Review of Bioequivalence Studies and Dissolution Data

Introduction

First Generic: No

Indication: It is indicated for the temporary relief of headache, muscular aches, the minor pain of arthritis, toothache, backache, minor aches and pains associated with the common cold, the pain of menstrual cramps, and for reduction of fever.

Type of Submission: Paper submission

Contents of Submission: Fasting and food studies on 200 mg tablet. Dissolution data on 200 mg tablet. The firm also submitted waiver request for tablet but later this strength was withdrawn.

RLD: Nuprin[®] (Bristol-Myers) 200 mg tablets (OTC product).

Recommended Dose:

Adults: 1 tablet or caplet every 4 to 6 hours while symptoms persist. If pain or fever does not respond to 1 tablet or caplet, 2 tablets or caplets may be used but not exceeding 6 tablets or caplets in 24 hours, unless directed by a doctor. The smallest effective dose should be used. Take with food or milk if occasional and mild heartburn, upset stomach, or stomach pain occurs with use.

Children: Not recommended for children under 12 except under the advice and supervision of a doctor.

Financial Disclosure: The principal investigator has no conflict of interest with Reddy-Cheminor, Inc.

<u>Protocol No.:</u> AAI-US-82, An Open Label Randomized Pharmacokinetic Study to Determine the Bioequivalence of Oral Ibuprofen Formulations in Normal Healthy Male Volunteers.

Study Information

STUDY FACILITY INFORMATION

DI OD I III OI III	
Clinical Facility:	
Principal Investigator:	
Clinical Study Dates:	Period I 08/19/2000
	Period II 08/26/2000

Analytical Facility	
Analytical Director:	
Analytical Study Dates:	9/07/00 to 10/05/00
Storage Period:	46 days

TREATMENT INFORMATION

Treatment ID:	A	В
Test or Reference:	T	R
Product Name:	Ibuprofen tablets	Nuprin [®]
Manufacturer:	Cheminor Drug, Ltd	Bristol-Myers
Manufacture Date:	May 2000	N/A
Expiration Date:	N/A	11/2001
ANDA Batch Size:	tablets	N/A
Full Batch Size:	tablets	N/A
Batch/Lot Number:	H001	811536
Potency:	99.1%	99.4%
Content Uniformity:	99.2%	99.4%
Strength:	200 mg	200 mg
Dosage Form:	Tablet	Tablet
Dose Administered:	200 mg	200 mg
Study Condition:	Fasting	Fasting
Length of Fasting:	10 hours	10 hours

RANDOMIZATION

DESIGN

Randomized:	Y	Design Type:	Crossover
No. of Sequences:	2	Replicated Treatment Design:	N
No. of Periods:	2	Balanced:	Y
No. of Treatments:	2	Washout Period:	7 days

AB: 2,3,4,6,8,9,13,15,16,20,21,22,25 BA: 1,5,7,10,11,12,14,17,18,19,23,24,26

DOSING

SUBJECTS

Single or Multiple Dose:	Single	IRB Approval:	Y
Steady State:	N	Informed Consent Obtained:	Y
Volume of Liquid Intake:	240 mL	No. of Subjects Enrolled:	26
Route of Administration:	Oral	No. of Subjects Completing:	26
Dosing Interval:	N/A	No. of Subjects Plasma Analyzed:	24
Number of Doses:	N/A	No. of Dropouts:	0
Loading Dose:	N/A	Sex(es) Included:	Male
Steady State Dose Time:	N/A	Healthy Volunteers Only:	Y
Length of Infusion:	N/A	No. of Adverse Events:	0

Samples from subject numbers 1-24 were analyzed as per protocol.

Subject Demographics:

Race:	White 18, African American 4, Asian 2, Hispanic 1, Other 1	
Sex:	Male 26, Female 0	
Height:	Mean: 70.3 inches, range 66-75 inches	
Weight:	Mean: 173.9 lbs., range 130-220 lbs	
Age group:	<18 0	
	18-40 25	
	41-64 1	
	65-75 0	
	>75 0, Mean age: 29.2 years, range 20-43 years	

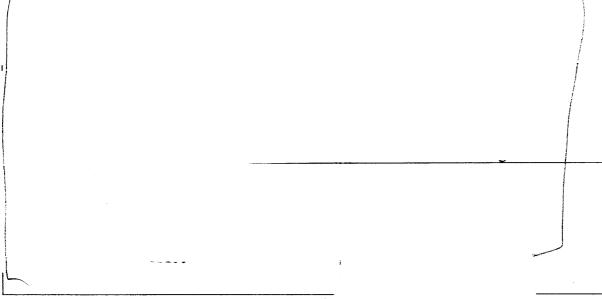
Dietary Restrictions:	No alcohol-, grapefruit or xanthine-containing food/beverages 24 hours before the study and during the study confinement. No water 1 hr pre-dose and 1 hr post-dose.
Activity Restrictions:	Subjects remained seated (or semi-reclined if necessary) for the first 4 hours, except when warranted by adverse events. No strenuous activity during the housing period.
Drug Restrictions:	No prescription medication within 7 days and OTC medication within 3 days prior to study. This prohibition did not include vitamins taken as nutritional supplements for non-therapeutic indications, as judged by attending physician.
Blood Sampling:	1x10 mL in evacuated tubes containing sodium heparin. Pre-dose (0 h) and 0.25, 0.5, 0.75, 1, 1.5, 2, 2.5, 3, 4, 6, 9, 10, 12 and 15 hours after dosing.

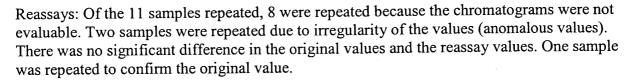
Study Results

1) Clinical

Protocol Deviations: There were six sampling time deviations of 3 minutes or less.

2) Analytical (Not to be Released Under FOI) Pre-Study Assay Validation:





Comments: The analytical method is acceptable.

3) Pharmacokinetics:

Mean Plasma Concentration:	Table 1, Figure 1	
Pharmacokinetic Parameters:	Table 1	
90% Confidence Intervals:	$LAUC_{0-t}$	95.85-103.14%
	$LAUC_{0-inf}$	95.86-103.10%
	LC_{max}	84.35-100.19%
AUC _{0-t} /AUC _{0-inf} ratios:	Test	0.98 (0.97-0.99)
	Reference	0.98 (0.96-0.99)
Root MSE:	$LAUC_{0-t}$	0.073922
	$LAUC_{0-inf}$	0.073443
• •	LC_{max}	0.173572

Comments:

1. The reviewer recalculated pharmacokinetic parameters and 90% confidence intervals. The reported values are in good agreement with those obtained by the reviewer.

- 2. Subject #7 had pre-dose drug concentration in period 1 (reference drug). Since this concentration was less than 5% of C_{max} value in this subject, the subject's data were not excluded.
- 3. The 90% confidence intervals for log transformed AUC_{0-t} , AUC_{0-inf} , and C_{max} are within acceptable limits. There was statistically significant sequence effect for LC_{max} .

Conclusion: The fasting study is acceptable.

<u>Protocol No.:</u> AAI-US-83, An Open Label Randomized Pharmacokinetic Study to Determine Effect of Food on the Bioequivalence of Oral Ibuprofen Formulations in Normal Healthy Male Volunteers.

Study Information

STUDY FACILITY INFORMATION

Clinical Facility:	
Medical Director:	
Clinical Study Dates:	Period I 10/22/00
-	Period II 10/29/00
	Period III 11/05/00
Analytical Facility	
Analytical Director:	
Analytical Study Dates:	November 8 to 26, 2000
Storage Period:	34 days

TREATMENT INFORMATION

Treatment ID:	С	A	В	
Test or Reference:	T	T	R	
Product Name:	Ibuprofen tablets	Ibuprofen tablets	Nuprin	
Manufacturer:	Cheminor Drugs	Cheminor Drugs	Bristol-Myers	
Manufacture Date:	5/2000	5/2000	N/A	
Expiration Date:	N/A	N/A	11/2001	
ANDA Batch Size:	tablets	tablets	N/A	
Batch/Lot Number:	H001	H001	811536	
Potency:	99.1%	99.1%	99.4%	
Content Uniformity:	99.2%	99.2%	99.4%	
Strength: 200 mg		200 mg	200 mg	
Dosage Form:	Tablet	Tablet	Tablet	
Dose Administered:	200 mg	200 mg	200 mg	
Study Condition:	tudy Condition: Fasting		Fed	
Length of Fasting:	Length of Fasting: 10 hours		10 hours	
Standardized N/A		Y	Y	
Breakfast:				
Breakfast Specifics:	N/A	1 buttered English muffin, 1 fried	1 buttered English muffin, 1 fried	

		egg, 1 slice of American cheese, 1 rasher of Canadian bacon, 1 serving of hash brown potatoes, 10 fL oz. of orange juice, 8 oz. whole milk	egg, 1 slice of American cheese, 1 rasher of Canadian bacon, 1 serving of hash brown potatoes, 10 fL oz. of orange juice, 8 oz. whole milk
Standardized Lunch:	Y	Y	Y

RANDOMIZATION

DESIGN

Randomized:	Y	Design Type:	Crossover
No. of Sequences:	6	Replicated Treatment Design:	N
No. of Periods:	3	Balanced:	N
No. of Treatments:	3	Washout Period:	7 days

BCA: 8,11,15 CBA: 2,3,5,21 ACB: 6,7,10,16 BAC: 9,17,18,19 ABC: 1,4,13 CAB: 12,14,20

DOSING

SUBJECTS

Single or Multiple Dose:	Single	IRB Approval:	Y
Steady State:	N	Informed Consent Obtained:	Y
Volume of Liquid Intake:	240 mL	No. of Subjects Enrolled:	21
Route of Administration:	Oral	No. of Subjects Completing:	21
Dosing Interval:	N/A	No. of Subjects Plasma Analyzed:	21
Number of Doses:	N/A	No. of Dropouts:	0
Loading Dose:	N/A	Sex(es) Included:	Male
Steady State Dose Time:	N/A	Healthy Volunteers Only:	Y
Length of Infusion:	N/A	No. of Adverse Events:	5

Subject Demographics:

Race:	White 14, African American 5, Asian 1, Other 1		
Sex:	Male 21, Female 0		
Height:	Mean: 70.5 inches, range: 65-74 inches		
Weight:	Mean: 182 lbs., range: 142-227 lbs.		
Age group:	<18 0		
	18-41 17		
	41-65 4		
	65-76 0		
	>75 0, Mean age: 32 years, range: 18-45 years		

Dietary Restrictions:	No alcohol- or grapefruit and xanthine-containing foods/beverages 24
	hours pre-dose and throughout the period of sample collection.
Activity Restrictions:	Subjects remained seated (or semi-reclined if necessary) for the first 4
	hours post-dose, except when warranted by adverse events. No
	strenuous activity during the housing period.

Drug Restrictions:	No prescription medication for 7 days preceding the study and no OTC medications 3 days preceding the study. This prohibition did not include vitamins taken as nutritional supplements for non-therapeutic indications, as judged by an attending physician.
Blood Sampling:	Same as in fasting study

Study Results

1) Clinical

Adverse Events:

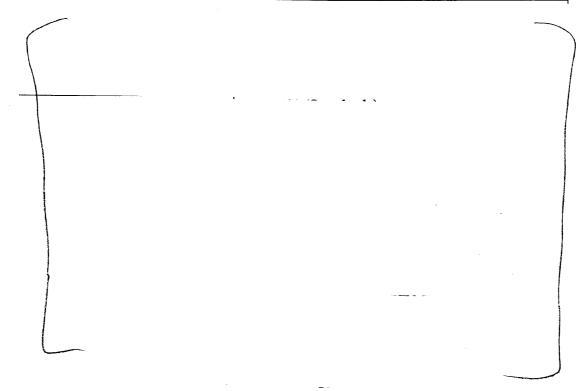
Subject	Complaint	Treatment	Intensity/Relationship
10	Hematoma	Ref-fed	Mild/remote
13*	Fatigue, Nausea, Fever, Diarrhea	Ref-fed	Moderate/remote

^{*} All events occurred approximately 24 hours after dosing.

Protocol Deviations: There were 8 sampling time deviations of 2 minutes or less.

2) Analytical (Not to be Released Under FOI)

Within-Study



Comments:

1. The reviewer recalculated pharmacokinetic parameters and ratios of means. The reported values are in good agreement with those obtained by the reviewer.

2. The ratios of means are within acceptable limits.

Conclusion: The non-fasting study is acceptable.

Formulation (Not to be released under FOI)

Ingredient	mg/tablet	% w/w
Ibuprofen, USP	200.0	
Microcrystalline Cellulose, NF		
Copovidone Ph. Eur		
Sodium Starch Glycolate, NF	the second secon	
Colloidal Silicon Dioxide,	The state of the s	
Magnesium Stearate, NF		
	1	
Hydroxypropyl methylcellulose, USP /		
Triacetin, USP		
Polysorbate 80, NF		
	The state of the s	Control of the second second
Total Weight (Coated)		

Test tablets: Brown, round, biconvex film coated tablets, embossed 'C2' on one side and plain on the other side.

Reference tablets: Yellow, round, biconvex film coated tablets embossed 'NUPRIN' on one side and plain on the other side.

The reference listed drug NUPRIN® is supplied as golden yellow round tablets and as golden yellow caplets. The test product is a tablet. Nuprin® tablets were compared with the test tablets in the bio-studies in this ANDA.

Dissolution (Not to be released under FOI)

Dissolution Method: USP 24

Dissolution Medium: pH 7.2 phosphate buffer

Volume: 900 mL

Dissolution Apparatus: 2 (paddle), 50 rpm

Mean Dissolution Data

Test			Referenc	Reference			
Lot No.: H001			Lot No.:	Lot No.: 811536			
Strength: 200 mg			Strength	Strength: 200 mg			
No. of Units:	: 12			No. of U	No. of Units: 12		
Time(min)	Mean	Range	%CV	Mean	Range	%CV	
0	0		0	0		0	
10	79		8.8	81		5.8	
20	88		2.3	97		1.9	
30	91		1.4	100		2.4	
45	93		0.9	101		2.3	
60	96		0.7	103		2.4	
75	95		2.1	104		2.5	

Dissolution Comments: The dissolution testing was conducted using the USP method. The test product meets the USP specification of NLT (Q) in 60 minutes. The test and reference tablets dissolve more than in 20 minutes and therefore f2 test is not relevant.

Recommendations:

- 1. The bioequivalence study conducted under fasting conditions by Dr. Reddy's Laboratories on its ibuprofen 200 mg tablets, lot #H001 comparing it to Nuprin[®] 200 mg tablets, lot #811536 manufactured by Bristol-Myers is acceptable to the Division of Bioequivalence. The study demonstrates that ibuprofen 200 mg tablet manufactured by Dr. Reddy's Laboratories is bioequivalent to the reference product, Nuprin[®] 200 mg tablet manufactured by Bristol-Myers.
- 2. The bioequivalence study conducted under non-fasting conditions by Dr. Reddy's Laboratories on its ibuprofen 200 mg tablets, lot #H001 comparing it to Nuprin® 200 mg tablets, lot #811536 manufactured by Bristol-Myers is acceptable to the Division of Bioequivalence. The study demonstrates that under non-fasting conditions, the bioavailability of ibuprofen 200 mg tablet manufactured by Dr. Reddy's Laboratories is similar to the reference product, Nuprin® 200 mg tablet manufactured by Bristol-Myers.
- 3. The dissolution testing conducted by the firm on its ibuprofen tablets is acceptable. The dissolution testing should be incorporated into firm's manufacturing controls and stability programs. The dissolution testing should be conducted in 900 mL of pH 7.2 phosphate buffer at 37°C using apparatus 2 (paddle) at 50 rpm. The test product should meet the following specifications:

Not less than — (Q) of the labeled amount of ibuprofen in the dosage form is dissolved in 60 minutes.

	-	
Min 8/27/01		
Kuldeep R. Dhariwal, Ph.D.		
Review Branch II		
Division of Bioequivalence	r	
RD INITIALED S. NERURKAR FT INITIALED S.NERURKAR	Date_	8/27/2001
Concur:	Date 8 28 200 1	
Dale P. Conner, Pharm.D.	•	
Director, Division of Bioequivalence		

4. From bioequivalence point of view, the firm has met the requirements for *in vivo* bioequivalence and *in vitro* dissolution testing and the application is acceptable.

APPEARS THIS WAY ON ORIGINAL

Table 1

MEAN PLASMA IBUPROFEN LEVELS FOR TEST (1) AND REFERENCE (2) PRODUCTS, n=24

	MEAN1	SD1	MEAN2	SD2	RMEAN12
TIME HR					
0	0.00	0.00	0.02	0.09	0.00
0.25	2.40	2.66	4.43	4.75	0.54
0.5	7.40	5.29	12.47	8.58	0.59
0.75	11.44	6.76	14.72	7.94	0.78
1	13.22	6.53	14.33	6.35	0.92
1.5	14.02	5.05	13.74	4.95	1.02
2	14.00	3.95	13.22	4.03	1.06
2.5	12.94	3.20	11.77	3.39	1.10
3	12.07	2.35	10.96	3.05	1.10
4	9.17	2.02	8.78	2.55	1.05
6	4.00	0.97	4.01	1.51	1.00
9 ·	1.68	0.51	1.71	0.72	0.98
12	0.73	0.31	0.73	0.39	1.00
15	0.22	0.24	0.25	0.25	0.90

UNIT: PLASMA LEVEL=MICROGRAM/ML TIME=HRS

ARITHMETIC MEANS AND RATIOS

MEAN1	SD1	MEAN2	SD2	RMEAN12
72.25	10.96	72.89	12.43	0.99
70.71	10.56	71.36	12.20	0.99
17.95	2.99	19.78	4.39	0.91
0.32	0.04	0.32	0.05	1.00
71.44	0.15	71.86	0.17	0.99
69.94	0.15	70.34	0.17	0.99
17.70	0.18	19.25	0.25	0.92
2.19	0.30	2.19	0.31	1.00
1.75	0.84	1.49	0.96	1.17
	72.25 70.71 17.95 0.32 71.44 69.94 17.70 2.19	72.25 10.96 70.71 10.56 17.95 2.99 0.32 0.04 71.44 0.15 69.94 0.15 17.70 0.18 2.19 0.30	72.25 10.96 72.89 70.71 10.56 71.36 17.95 2.99 19.78 0.32 0.04 0.32 71.44 0.15 71.86 69.94 0.15 70.34 17.70 0.18 19.25 2.19 0.30 2.19	72.25 10.96 72.89 12.43 70.71 10.56 71.36 12.20 17.95 2.99 19.78 4.39 0.32 0.04 0.32 0.05 71.44 0.15 71.86 0.17 69.94 0.15 70.34 0.17 17.70 0.18 19.25 0.25 2.19 0.30 2.19 0.31

UNIT: AUC=MICROGRAM HR/ML CMAX=MICROGRAM/ML TMAX=HR
LOG-TRANSFORMED DATA WERE CONVERTED TO ANTI-LOG IN THE TABLE
LSMEANS AND 90% CONFIDENCE INTERVALS

	LSM1	LSM2	RLSM12	LOWCI12	UPPCI12
PARAMETER					
AUCI	72.25	72.89	0.99	95.57	102.68
AUCT	70.71	71.36	0.99	95.51	102.66
CMAX	17.95	19.78	0.91	83.37	98.17
LAUCI	71.44	71.86	0.99	95.86	103.10
LAUCT	69.94	70.34	0.99	95.85	103.14
LCMAX	17.70	19.25	0.92	84.35	100.19

Table 2

MEAN PLASMA IBUPROFEN LEVELS FOR TEST AND REFERENCE PRODUCTS IN NON-FASTING STUDY, N=21

	MEAN1	SD1	MEAN2	SD2	MEAN3	SD3	RMEAN12
TIME HR							
0	0.00	0.00	0.00	0.00	0.00	0.00	
0.25	1.72	2.08	1.35	2.17	0.10	0.39	1.28
0.5	5.41	4.57	6.56	7.01	4.87	6.81	0.82
0.75	8.09	6.37	8.31	7.13	9.32	7.76	0.97
1	9.94	6.43	9.39	6.18	11.21	6.21	1.06
1.5	12.73	5.99	10.50	2.82	11.30	3.75	1.21
2	12.62	4.83	10.43	1.91	10.76	1.98	1.21
2.5	12.34	2.89	9.64	2.11	10.08	2.90	1.28
3	11.44	2.62	8.48	2.30	8.79	2.76	1.35
4	8.81	2.67	6.98	2.35	6.77	2.20	1.26
6	3.92	1.25	3.51	1.76	3.44	1.34	1.12
9	1.58	0.57	1.71	1.07	1.45	0.67	0.93
12	0.63	0.35	0.76	0.63	0.60	0.39	0.83
15	0.24	0.24	0.26	0.33	0.21	0.23	0.91

(CONTINUED)

UNIT: PLASMA LEVEL=MICROGRAM/ML TIME=HRS

MEAN PLASMA IBUPROFEN LEVELS FOR TEST AND REFERENCE PRODUCTS

	RMEAN13	RMEAN23
TIME HR		
0		
0.25	16.99	13.32
0.5	1.11	1.35
0.75	0.87	0.89
1	0.89	0.84
1.5	1.13	0.93
2	1.17	0.97
2.5	1.22	0.96
3	1.30	0.96
4	1.30	1.03
6	1.14	1.02
9	1.09	1.18
12	1.06	1.28
15	1.16	1.28

1= Test fasting

2= Test fed

3= Reference fed

Table 3

IBUPROFEN ARITHMETIC MEANS AND RATIOS IN NON-FASTING STUDY, N=21

	MEAN1	SD1	MEAN2	SD2	MEAN3	SD3	RMEAN12
PARAMETER							
AUCI	66.05	15.05	57.70	13.58	56.77	12.08	1.14
AUCT	64.66	14.66	55.92	12.79	55.24	11.87	1.16
CMAX	16.31	3.72	14.06	3.73	14.90	4.56	1.16
KE	0.33	0.06	0.31	0.07	0.31	0.06	1.07
LAUCI	64.42	0.23	56.22	0.23	55.58	0.21	1.15
LAUCT	63.06	0.23	54.55	0.23	54.06	0.21	1.16
LCMAX	15.86	0.25	13.63	0.25	14.28	0.30	1.16
THALF	2.17	0.34	2.38	0.54	2.28	0.39	0.91
TMAX	1.96	0.96	1.56	0.96	1.56	0.77	1.26

(CONTINUED)

UNIT: AUC=MICROGRAM HR/ML CMAX=MICROGRAM/ML TMAX=HR
LOG-TRANSFORMED DATA WERE CONVERTED TO ANTI-LOG IN THE TABLE

ARITHMETIC MEANS AND RATIOS

	RMEAN13	RMEAN23
PARAMETER		
AUCI	1.16	1.02
AUCT	1.17	1.01
CMAX	1.09	0.94
KE	1.04	0.97
LAUCI	1.16	1.01
LAUCT	1.17	1.01
LCMAX	1.11	0.95
THALF	0.95	1.04
TMAX	1.26	1.00

UNIT: AUC=MICROGRAM HR/ML CMAX=MICROGRAM/ML TMAX=HR LOG-TRANSFORMED DATA WERE CONVERTED TO ANTI-LOG IN THE TABLE

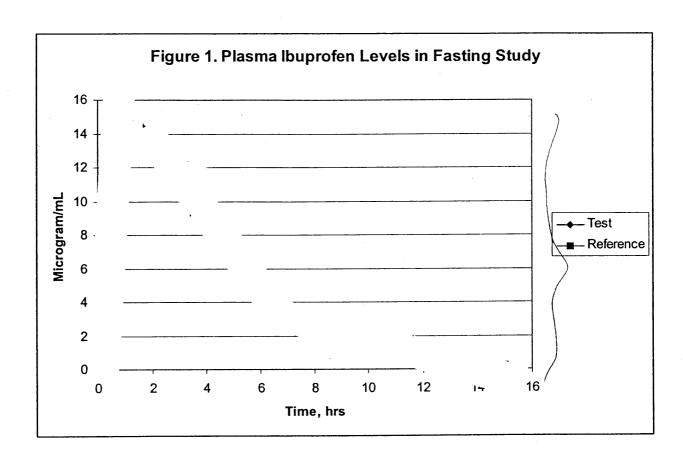
LSMEANS AND RATIOS

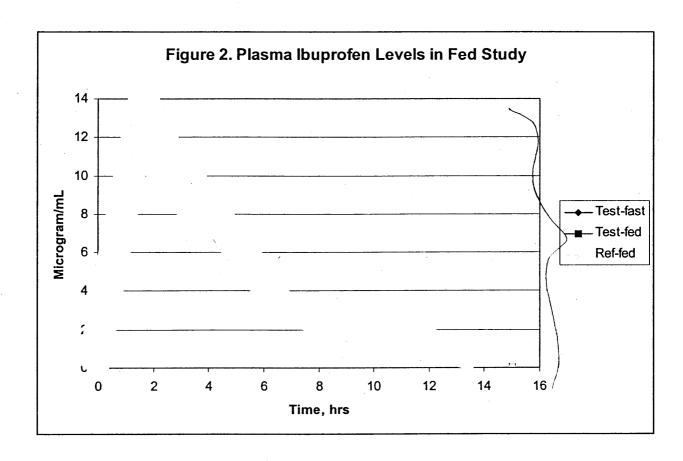
	LSM1	LSM2	LSM3	RLSM12	RLSM13	RLSM23
PARAMETER						
AUCI	66.01	57.66	56.73	1.14	1.16	1.02
AUCT	64.63	55.89	55.22	1.16	1.17	1.01
CMAX	16.32	14.07	14.92	1.16	1.09	0.94
LAUCI	64.52	56.31	55.66	1.15	1.16	1.01
LAUCT	63.17	54.65	54.15	1.16	1.17	1.01
LCMAX	15.90	13.66	14.31	1.16	1.11	0.95

¹⁼ Test fasting

²⁼ Test fed

³⁼ Reference fed





CC: ANDA 76-117
ANDA DUPLICATE
DIVISION FILE
HFD-651/ Bio Drug File
HFD-655/ Dhariwal

V:\FIRMSAM\CHEMINOR\LTRS&REV\76117SD.201

Endorsements: (Final th Dates)
HFD-655/ Dhariwal

HFD-655/ Nerurkar

HFD-650/ D. Conner for her 8/22/2001

BIOEQUIVALENCY - ACCEPTABLE

Submission dates: 2/14/01

5/11/01

151 8/27/01

1. FASTING STUDY (STF)

Analytical:

2. FOOD STUDY (STP)
Clinical:

Analytical:

3. STUDY AMENDMENT (STA)
Long-term stability data
5/11/2001

Strengths: 200 mg
Outcome: AC

Strengths: 200 mg

Strengths: 200 mg

Outcome Decisions: AC - Acceptable

WinBio Comments:

BIOEQUIVALENCY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 76-117 APPLICANT: Dr. Reddy's Laboratories

DRUG PRODUCT: Ibuprofen tablets, USP

200 mg

The Division of Bioequivalence has completed its review and has no further questions at this time.

The dissolution testing will need to be incorporated into your stability and quality control programs as specified in USP 24.

Please note that the bioequivalency comments provided in this communication are preliminary. These comments are subject to revision after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling, or other scientific or regulatory issues. Please be advised that these reviews may result in the need for additional bioequivalency information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

fu

Dale P. Conner, Pharm. D. Director, Division of Bioequivalence Office of Generic Drugs Center for Drug Evaluation and Research CC: ANDA 76-117

ANDA DUPLICATE DIVISION FILE

HFD-651/ Bio Drug File

HFD-655/ Dhariwal

V:\FIRMSAM\CHEMINOR\LTRS&REV\76117SD.201

Endorsements: (Fin Lith Dates)
HFD-655/ Dhariwa (12)

HFD-655/ Nerurkar

HFD-650/ D. Conner (128/2001

BIOEQUIVALENCY - ACCEPTABLE

Submission dates: 2/14/01 5/11/01

|S| - 5[27|0]

1. FASTING STUDY (STT.
Clinical:
Analytical:

2. FOOD STUDY (STP)
Clinical:

Analytical:

3. STUDY AMENDMENT (STA)

Long-term stability data

y 5/11/2001

Strengths: 200 mg

Outcome: AC

Strengths: 200 mg
Outcome: AC

Strengths: 200 mg
Outcome: AC

Outcome Decisions: AC - Acceptable

WinBio Comments:

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

ADMINISTRATIVE DOCUMENTS

OFFICE OF GENERIC DRUGS ABBREVIATED NEW DRUG APPLICATION

ANDA TENTATIVE APPROVAL SUMMARY

ANDA: 76-117

DRUG PRODUCT: Ibuprofen, USP

FIRM: Dr. Reddy's Laboratories Limited

DOSAGE FORM: Oral Tablets

STRENGTH: 200 mg

cGMP STATEMENT/EIR UPDATE STATUS:

The cGMP Statement located in Vol. 1.7, page 2235 is satisfactory.

The overall recommendation for the Establishment Evaluation Request is acceptable (3/29/01).

BIO STUDY:

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Acceptable August 28, 2001 (Bio review dated 5/11/01). The recommended dissolution specifications are as follows:

The dissolution testing should be conducted in 900 ml of phosphate buffer, pH 7.2 at 37°C using USP Apparatus II (paddle) at 50 rpm. The test product should meet the following specifications:

Not less than (Q) of the labeled amount of Ibuprofen is dissolved in 60 minutes.

VALIDATION:

The drug substances and drug product are both USP compendial. FDA methods validation is not required.

STABILITY- (ARE CONTAINERS USED IN STUDY IDENTICAL TO THOSE IN CONTAINER SECTION?):

The containers used in the accelerated and room temperature studies are the same as proposed in the application. The firm provided 12 weeks accelerated conditions and 6 months controlled room temperature stability data for the drug product packaged in 24's and 500's container/closure system.

The accelerated stability data supports Dr. Reddy's proposed tentative expiry date of 24 months.

Stability test and specifications are as follows:

Assay:

Ibuprofen of the labeled amount of Ibuprofen.

Dissolution:

The dissolution testing should be conducted in 900 ml of phosphate buffer, pH 7.2 at 37°C using USP Apparatus II (paddle) at 50 rpm. The test product should meet the following specifications:

Not less than \smile (Q) of the labeled amount of Ibuprofen is dissolved in 60 minutes.

Appearance:

Brown round, biconvex, film coated tablets, embossed "C2" on one side and the other side is plain.

· NMT

Limit of

_____NMT

Related Substances:

Maximum individual impurity: NMT Total Impurities: NMT

LABELING Review Status: Acceptable

Labeling acceptable September 4, 2001 by John Grace and Jim Barlow.

STERILIZATION VALIDATION (IF APPLICABLE): N/A

SIZE OF BIO BATCH:

Dr. Reddy's Laboratories manufactured one bio batch, 200 mg (Lot # H001). This batch was used for stability studies.

Ibuprofen, drug substance, used in the bio batches is supplied by

The drug substance is a Type II DMF # and is adequate as of 04/7/00.

SIZE OF STABILITY BATCHES - (IF DIFFERENT FROM BIO BATCH WERE THEY MANUFACTURED VIA THE SAME PROCESS?):

Dr. Reddy's Laboratories, Inc. manufactured one exhibit batch: Batch #: H001. This batch is used as the bio-batch and used in the stability studies.

PROPOSED PRODUCTION BATCH - (MANUFACTURING PROCESS THE SAME AS BIO/STABILITY?): The proposed post-approval batch size is tablets.

CHEMIST: R.F. Powers, Ph.D.

Team Leader: A. Mueller, Ph.

DATE: 10/23/01

DATE: 10/23/01

APPEARS THIS WAY ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

76-117

CORRESPONDENCE

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ONE PARK WAY
UPPER SADDLE RIVER, NJ 07458
TELEPHONE: (201) 760-2880

OCT 0 1 2001

FAX:

(201) 760-0401

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

ORIG AMENDMENT

mg AND RESERVE

Reference: ANDA # 76-117 Ibuprofen Tablets USP, 200 mg

Minor Amendment

Dear Sir/ Madam:

Dr. Reddy's Laboratories Inc., US Agent for Dr. Reddy's Laboratories Limited, is providing this response to the Minor NA dated July 27,2001 on their behalf. Reference is made to the original submission and the amendment dated September 14, 2001and the original submission dated May 15, 2001.

The foreign firm inadvertently submitted the amendment without the knowledge of the US agent. At the request of the agency, the US agent obtained a copy from the foreign firm, and it is hereby being resubmitted at this time. As requested, the US agent has informed the foreign firm of the legal requirements to submit through the US agent. The firm apologies for this misunderstanding on their part and for any incontinence that this has caused. The following submission supercedes the minor amendment response previously provided.

A. Chemistry Deficiencies:

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- B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:
 - 1) Please be aware that any Bioequivalence deficiencies must be resolved prior to approval of the ANDA

The Firm acknowledges that any Bioequivalence deficiencies must be resolved prior to approval of the ANDA.

2) Please be aware that any labeling deficiencies must be resolved prior to approval of the ANDA

The Firm acknowledges that any labeling deficiencies must be resolved prior to approval of the ANDA.

3) Please provide any additional stability data accrued to date.

The updated long-term (25° C/60% RH) stability data for 12 months is provided in Section XVI Stability of Finished Dosage Form.

4) Please acknowledge that the USP methods are the regulatory methods and will prevail in resolution in any dispute.

The Firm acknowledges that the USP methods are the regulatory methods and will prevail in resolution in any dispute.

Labeling Deficiencies:

GENERAL COMMENTS

Revise your labels and labeling to be in accordance with the most recently approved labels and labeling for the reference drug, Motrin IB (NDA 19-012/S-024; approved October 2, 2000, to be in conformance with the OTC Labeling Final Rule 21 CFR 201.66). (See attached copy)

Please revise your labels and labeling, as instructed above, and submit in final print or draft if you prefer.

The labels and labeling have been revised as per the currently approved reference listed drug Motrin® IB, as recommended by the agency.



The revised labels and labeling including 12 final printed copies are provided in the following Sections:

Section IV:

Side by Side Comparison of Previously Submitted Container Label and Proposed Container Label Package Sizes: 24's, 50's, 100's, 150's, 200's, 250's and 500's count

Side by Side Comparison of Previously Submitted Carton Label and Proposed Carton Label Package Sizes: 24's, 50's, 100's,

150's, 200's, 250's and 500's count

Side by Side Comparison of Previously Submitted Package Insert

Label and Proposed Package Insert Label

Section V:

Proposed Container Labels
Proposed Carton Labels

Proposed Package Insert Label (PIL)

Please communicate any remaining questions or issues to C. Jeanne Taborsky, and they will be addressed and a response submitted. This concludes our submission. Please feel free to contact me if you have any questions, tele (410) 309-3145, Fax (410) 309-6145.

Sincerely yours,

C. Jeanne Taborsky

C. Jeanne Valouskey)

Regulatory Affairs



Dr. Reddy's Laboratories Limited GENERICS

Bachepalli - 502 325, INDIA. Mailing Address: Bachepalli, Post Bag No.15, Kukatpally P.O., Hyderabad - 500 072, INDIA.

Tel: 91 40 304 5206 Fax: 91 40 304 5238 www.drreddys.com

Date: Aug 16th, 2001

Office of Generic Drugs

Center for Drug Evaluation and Research Food and Drug Administration Document Control Room Metro Park North II 7500 Standish Place, Room 150 Rockville, MD 20855-2773

ORIG AMENDMENT

N/FA

Fax Amendment

Reference:

Ibuprofen Tablets, USP, 200 mg.

ANDA No.: 76-117

Dear Sir/ Madam:

This is in reference to your letter dated July 27, 2001 regarding our pending ANDA 76-117 for lbuprofen Tablets, USP, 200 mg. Dr. Reddy's Laboratories Limited (DRL) herewith submits the "Fax Amendment" including the following information in response to the Agency's Correspondence:

A. Chemistry Deficiencies:

FDA Comment:



Regd. Office:

7-1-27, Ameerpet, Hyderabad 500 016, INDIA.

Tel: 91 40 373 1946 Fax: 91 40 373 1955 Redacted _____

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FDA Comment

We note that you have not provided the percent recovery data for each impurity in spiked samples (for example, page 3120, Vol. 1.9, Figure 6). Please provide.

Response:

The percent recovery data at spiked levels of provided in *Exhibit – IV*.

FDA Comment

6) Please add a statement to your Post Approval Stability Protocol that any extension of the expiration dating period will be based on the drug product's room temperature stability data.

Response:

As recommended by the Agency, the Post Approval Stability Protocol has been revised to include the Statement "Any extension of the expiration dating period will be based on the drug product's room temperature stability data. The revised Post Approval Stability Protocol is provided in Exhibit - V.

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:

FDA Comment:

1) Please be aware that any Bioequivalency deficiencies must be resolved prior to approval of the ANDA.

Response:

We note and acknowledge the agency's comment.

FDA Comment:

2) Please be aware that any labeling deficiencies must be resolved prior to approval of the ANDA.

Response:

(')

We note and acknowledge the agency's comment.



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FDA Comment:

3) Please provide any additional stability data accrued to date.

Response:

The updated long term (25°C/60% RH) stability data for 12 months is provided in *Exhibit – VI*.

FDA Comment:

4) Please acknowledge that the USP methods are the regulatory methods and will prevail in resolution in any dispute.

Response:

We note and acknowledge the agency's comment.

Labeling Deficiencies:

FDA Comment:

GENERAL COMMENTS

Revise your labels and labeling to be in accordance with the most recently approved labels and labeling for the reference drug, Motrin IB (NDA 19-012/S-024; approved October 2, 2000, to be in conformance with the OTC Labeling Final Rule 21 CFR 201.66). (See attached copy)

Please revise your labels and labeling, as instructed above, and submit in final print or draft if your prefer.

Response:

The labels and labeling have been revised as per the currently approved reference listed drug Motrin[®] IB, as recommended by the agency.

The revised labels and labeling including 12 final printed copies are provided in the following Exhibits:

Exhibit VII	-	Proposed Container Label (oottle) 24's count
(12 Final		Proposed Container Label / bottle) 50's count
printed		Proposed Container Label / bottle) 100's count
copies)		Proposed Container Label — bottle) 150's count
		Proposed Container Label — bottle) 200's count
		Proposed Container Label pottle) 250's count
		Proposed Container Label bottle) 500's count

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Exhibit VIII - Side by Side Comparison of Previously Submitted

Container Label and Proposed Container Label Package Sizes: 24's, 50's, 100's, 150's, 200's

250's and 500's count

Exhibit IX - Proposed Carton Label 24's count
(12 Final Proposed Carton Label 50's count
printed Proposed Carton Label 100's count

copies)

Proposed Carton Label 100's count
Proposed Carton Label 200's count
Proposed Carton Label 250's count

Proposed Carton Label 500's count

Exhibit X - Side by Side Comparison of Previously Submitted

Carton Label and Proposed Carton Label Package Sizes: 24's, 50's, 100's, 150's, 200's

250's and 500's count

Exhibit XI - Proposed Package Insert Label (PIL)

Exhibit XII - Side by Side Comparison of Previously Submitted

Package Insert Label and Proposed Package Insert

Label

Pursuant to 21 CFR 314.440(a)(4), a third copy of this application is enclosed. This is the required field copy and we certify that it is a true copy of the technical section as described in 21 CFR 314.50(d)(1).

Included in this submission is an extra copy of our cover letter. Kindly acknowledge by date stamping this letter upon receipt and forwarding this copy to us.

If you have any questions, please contact the undersigned or Mr. Paul V. Campanelli, (US Agent for Dr. Reddy's Laboratories Limited) Vice President – Formulation Business, Reddy – Cheminor Inc., at One Park Way, Upper Saddle River, NJ 07458, Phone No.: 201-760-2880, Fax no.: 201-760-0401.

Sincerely,

Pravir Choubey

Manager – Regulatory Affairs Phone No.: 91-40-3043919 Fax No.: 91-40-3045238

66 South Maple Avenue, Ridgewood, NJ 07450

Phone: 201-444-4424 201-444-1456 Fax:

FAXed to 301-594-1174

March 12, 2001

Office of Generic Drugs Food and Drug Administration Center for Drug Evaluation and Research **Document Control Room** Metro Park North II 7500 Standish Place, Room 150 Rockville, MD 20855-2773

Withdrawal of ... only!

Only the 200mg should

be represed!! ANDA # 76-117 ibuprofen Tablets USP 200 and Reference:

CORRESPONDENCE

Dear Sir/ Madam:

Reddy-Cheminor Inc. US Agent for Dr. Reddy's Laboratories Limited, Bachepalli 502 325, INDIA, is submitting this communication at the request of the Office of Generic Drugs, Food and Drug Administration. Reference is made to the original submission.

The Firm hereby withdraws without prejudice any and all references and information relating to the _____ strength. The subject of this application will be Ibuprofen Tablets USP 200 mg only.

Pursuant to Code of Federal Regulations Title 21 §314.440 (a) (4), a third copy of this communication is being provided. This is the required field copy and we certify that it is a true copy of the technical section as described in Code of Federal Regulations Title 21 §314.50 (d) (1).

Please contact C. Jeanne Taborsky at (410) 309-3145 or Paul V. Campanelli, Vice President Formulations Business, Reddy-Cheminor, Inc. at (201) 444-4424 or by fax at (201) 444-1456, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky

Regulatory Affairs Consultant

MAR 28

Reddy-Cheminor, Inc.
U.S. Agent for Dr. Reddy's Laboratories Limited
Attention: Paul V. Campanelli
66 South Maple Avenue
Ridgewood, NJ 07450

Dear Sir:

We acknowledge the receipt of your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act.

Reference is made to the telephone conversation dated March 14, 2001 and your correspondence dated March 19, 2001.

NAME OF DRUG: Ibuprofen Tablets USP, 200 mg

DATE OF APPLICATION: February 14, 2001

DATE (RECEIVED) ACCEPTABLE FOR FILING: February 15, 2001

We will correspond with you further after we have had the opportunity to review the application.

Please identify any communications concerning this application with the ANDA number shown above.

Should you have questions concerning this application, contact:

Tim Ames Project Manager (301) 827-5848

Sincerely yours,

Wm Peter Rickman
Acting Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

ANDA 76-117

Reddy-Cheminor, Inc.
U.S. Agent for Dr. Reddy's Laboratories Limited
Attention: Paul V. Campanelli
66 South Maple Avenue
Ridgewood, NJ 07450
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Dear Sir:

We acknowledge the receipt of your communication dated March 12, 2001, requesting withdrawal of your abbreviated new drug application for Ibuprofen Tablets USP, _____ only.

In compliance with your request the Ibuprofen Tablets USP — mg, is regarded as withdrawn. This withdrawal does not prejudice any future filing of the application. You may request that the information in this application be considered in connection with any resubmission.

Sincerely yours,

Wm Peter Rickman Acting Director

Division of Labeling and Program Support

Office of Generic Drugs

Center for Drug Evaluation and Research

CC: ANDA 76-117
Division File
HFD-647/Chem Branch
HFD-612/Bio PM
HFD-92
Field Copy
HFD-610/R.West
HFD-610/P.Rickman

Endorsements:

HFD-615/GDavis, Chief, PG. / HFD-615/SMiddleton, CSC Word File

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F/T by

Withdrawal of the ONLY!

REDDY-CHEMINOR, INC.



66 South Maple Avenue Ridgewood, New Jersey 07450 Telephone (201) 444-4424 Telefax (201) 444-1456

February 14, 2001

Office of Generic Drugs Food and Drug Administration Center for Drug Evaluation and Research **Document Control Room** Metro Park North II 7500 Standish Place, Room 150 Rockville, MD 20855-2773

Reference:

Ibuprofen Tablets, USP and 200 mg **Abbreviated New Drug Application**

Dear Sir/ Madam:

Dr. Reddy's Laboratories Limited (Formerly Cheminor Drugs Limited) herewith submits an abbreviated new drug application (ANDA) for Ibuprofen Tablets, USP ____, and 200 mg pursuant to Section 505 (i) of the Federal Food, Drug, and Cosmetic Act.

_NUPRIN® This ANDA refers to the listed drug, (Ibuprofen) Tablets 200 mg which is manufactured by McNEIL / Bristol-Myers the holder of the approved application and which is listed in the Approved Drug Products with Therapeutic Equivalence Evaluations (commonly known as the Orange Book).

Ibuprofen Tablets, USP and 200 mg have been developed and will be manufactured, tested and packaged by Dr. Reddy's Laboratories Limited (Formerly Cheminor Drugs Limited), Bachepally, Post Bag No.15, Kukatpally P.O., Hyderabad 500 072, INDIA manufacturing facility, in accordance with 21 CFR § 210 and 211.

The manufacturer of the drug substance used to produce the ANDA / Biobatch of this product is Dr. Reddy's Laboratories Limited - Bulk Drug Division (Formerly Cheminor Drugs Limited - Bulk Drug Division), Plot No. 9/A, Phase 3, I.D.A. Jeedimetla, Hyderabad - 500 055, INDIA DMF

The required bioavailability / bioequivalence studies were conducted on Ibuprofen Tablets, USP 200 mg and NUPRIN® (Ibuprofen) Tablets 200 mg by These studies indicate that Ibuprofen Tablets USP, 200 mg are

bioequivalent to NUPRIN® (Ibuprofen) Tablets, 200 mg.

The in vitro dissolution profiles for Ibuprofen Tablets, USF are comparable to those of The formulations of Ibuprofen Tablets, USP dose proportional to Ibuprofen Tablets USP 200 mg. A waiver for the bioavailability/ bioequivalence study for the is requested.



REDDY-CHEMINOR, INC.

February 14, 2001

Food and Drug Administration
Ibuprofen Tablets, USP ____ and 200 mg
Abbreviated New Drug Application

Page 2

Ibuprofen Tablets, USP —— and 200 mg are stable and a two year expiration dating is requested. The two year expiration dating for these products is supported by one, two and three months accelerated stability data (40° C \pm 2° C/ $75\% \pm 5\%$ Relative Humidity) in the smallest and largest fill size of the container / closure system proposed for marketing. The stability studies were conducted under a stability protocol that is in conformance with the current FDA Stability guidelines.

The dosage form, route of administration, active ingredient, potency and labeling (except DESCRIPTION & HOW SUPPLIED) for Ibuprofen Tablets, USP _____ and 200 mg are same as those for _____ and NUPRIN® (Ibuprofen) Tablets, 200 mg, respectively.

This ANDA is submitted in thirteen volumes:

Volume I

Section I through Section V

Volume II through

Volume V

Section VI

Volume VI

Section VII through Section VIII

Volume VII

Section IX through Section XI

Volume VIII

Section XII

Volume IX

Section XIII through Section XV

Volume X

Section XV through Section XXII

Included in this submission is an extra copy of our cover letter. Please acknowledge by date stamping this letter upon receipt and forwarding this copy to us in the self addressed stamped envelope provided for your convenience.

REDDY-CHEMINOR, INC.

February 14, 2001

Food and Drug Administration
Ibuprofen Tablets, USP —— and 200 mg
Abbreviated New Drug Application

Page 3

Pursuant to 21 CFR 314.440 (a) (4), a third copy of this application is also enclosed. This is the required field copy and we certify that it is a true copy of the technical section as described in 21 CFR 314.50 (d) (1).

We also notify the agency that due to the recent merger of Cheminor Drugs Limited into Dr. Reddy's Laboratories Limited, our company name has been changed from Cheminor Drugs Limited —Pharma Division to Dr. Reddy's Laboratories Limited — Generics.

As far as this ANDA is concerned, as most of the documents have been generated prior to the change of name, we have maintained the company name as Cheminor Drugs Limited – Pharma Division throughout this ANDA. However the labeling includes Dr. Reddy's Laboratories Limited as the name of the manufacturer.

We request the agency, to henceforth to consider our company name as Dr. Reddy's Laboratories Limited – Generics for correspondence purpose. All the addresses remains the same.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned at (201)444-4424 or by fax at (201) 444-1456.

Sincerely,

Paul V. Campanelli
Vice President, Formulations Business